

EXHIBIT 1

Golightly & Vannah vs. Hamlett, et al.
Case No. 3:16-cv-00144-MMD-VPC

OPPOSITION TO MOTION TO AMEND COMPLAINT

EXHIBIT 1

Nathan Jenkins

From: Nathan Jenkins
Sent: Tuesday, June 28, 2016 2:35 PM
To: 'L. DiPaul Marrero'; Jennifer Salisbury
Cc: mbourassa@blgwins.com; trichards@blgwins.com; Anderson, Paul; Rowe, Kim; dmendez@vannahlaw.com
Subject: RE: Golightly & Vannah v. Hamlett, et al.- District Court Case No. 3:16-cv-00144-MMD-VPC

Mr. Marrero,

I received the Stipulation to Amend from your office on June 7, 2016. I executed and returned it to you on June 8, 2016. The Joint Case Management Report/Order filed June 7, 2016 states in paragraph 12 that the "deadline for amending pleadings and adding parties" is June 21, 2016. You did not file the Stipulation to Amend, an amended complaint, or motion for leave to file an amended complaint before June 21, 2016. In my view you are now barred from adding a party. The Rawlings Company LLC is not a party to this action. I am not willing to continue the settlement conference. I expect to proceed with the settlement conference as ordered. Also, the Order Scheduling Settlement Conference ordered you to make a specific settlement offer to Defendants on June 24, 2016. You failed to do so. The Order further stated in bold: **If the parties fail to present specific proposals and counter proposals prior to the settlement conference, sanctions may be imposed by the court if appropriate.** I will provide you my settlement offer as ordered on July 1, 2016.

Nathan M. Jenkins